

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
Conservation Law Foundation, Inc.,)	
)	Case No. 1:18-cv-11820-DPW
Plaintiff,)	
)	
)	
)	
v.)	
)	
Wequassett Inn LLP, d/b/a)	
Wequassett Resort and Golf Club,)	
and Weston & Sampson, Inc.,)	
)	
Defendants.)	
_____)	

DECLARATION OF HEATHER A. GOVERN

Pursuant to U.S.C. § 1746, I, Heather A. Govern, declare as follows:

1. I am a program director and a practicing attorney at Conservation Law Foundation, Inc. ("CLF" or "Plaintiff"). I am one of the attorneys representing CLF in this matter.
2. I have personal knowledge of the facts stated herein, based on my experience or my consultation with others, or they are known to me in my capacity as counsel for CLF, and each of them is true and correct.
3. I submit this declaration in support of the Joint Motion for Extension to Serve the Complaint.
4. CLF and counsel for the defendants, Anderson & Kreiger LLP and Donovan Hatem LLP, are in negotiations which may resolve or narrow the issues in the above captioned case. On October 25, 2018, the parties met for a negotiation session in Boston, Massachusetts.

5. For purposes of continuing negotiation, the parties will be meeting again in the near future and are discussing the exchange of additional documentation concerning the claims in the Complaint (Doc. 1).
6. An extension of the time to effect service will allow for further negotiations, which may resolve the underlying issues in the action without expending judicial resources.
7. On August 24, 2018 CLF filed its complaint. The 90-day period for CLF to effect service upon Defendants ends on Friday, November 23, 2018. *See* Fed. R. Civ. P. 6(a)(1)(c).
8. A 60-day extension of the time to effect service would extend the deadline from Friday, November 23, 2018 to Tuesday, January 22, 2019. *See* Fed. R. Civ. P. 6(a)(1)(c).
9. I believe that the parties' ongoing negotiations toward a resolution of the underlying issues in this action constitute good cause under Local Rule 4.1(b) and Fed. R. Civ. P. 6(b) for the requested extension of time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 20, 2018

Respectfully submitted,

CONSERVATION LAW FOUNDATION, INC.

By its attorney:

/s/ Heather A. Govern

Heather A. Govern, Esq., BBO# 688482

Conservation Law Foundation

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CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2018, the foregoing Affidavit was filed through the ECF system, by which means a copy of the filing will be sent electronically to all parties registered with the ECF system.

/s/ Heather A. Govern
Heather A. Govern